

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE)
APPLICATION OF THE UNITED)
STATES OF AMERICA FOR AN)
ORDER AUTHORIZING THE) M.B.D. No. 18-MC-91232-ADB
CONTINUED INTERCEPTION OF)
WIRE AND ELECTRONIC)
COMMUNICATIONS OCCURRING) FILED UNDER SEAL
ON AT&T WIRELESS)
TELEPHONE [REDACTED]-8802)

APPLICATION TO SEAL RECORDINGS
AND TO POSTPONE INVENTORIES

The United States of America, by and through Assistant U.S. Attorney Eric S. Rosen,
herein applies for an Order:

Sealing DVD disks which contain recordings of wire and electronic communications
intercepted pursuant to an Order dated August 30, 2018 over cellular telephone with call number
[REDACTED] 8802 (TARGET TELEPHONE 1). The Court Order concerned the following federal
offenses (TARGET OFFENSES):

- a. Title 18, United States Code Section 1343 – wire fraud and honest services
wire fraud;
- b. Title 18, United States Code, Section 1952 – Travel Act (bribery);
- c. Racketeering and racketeering conspiracy, in violation of 18 U.S.C. §§
1962(c) and (d), and punishable under 18 U.S.C. § 1963, by conducting the
affairs of an “enterprise,” that is, a group of individuals associated in fact,
although not a legal entity, to wit: the Subjects and others, the activities of

which affect interstate and foreign commerce, through a pattern of racketeering activity consisting of the violations of federal law set forth in (a) through (c) above, and,

d. Title 26, United States Code, Section 7201 – Attempt to Evade or Defeat Tax.

(b) Directing that the aforementioned DVD disks be held in the custody of the Federal Bureau of Investigation (“FBI”) for a period of ten years from the date of this Order in a manner so as to prevent editing, alteration, and/or destruction;

(c) Directing that the contents of the said DVD disks be disclosed only upon the Order of this Court or any other court of competent jurisdiction, except that disclosure may be made pursuant to Title 18, United States Code, Section 2517 and consistent with the Court’s prior Orders;

(d) Postponing the notification requirements of Title 18, United States Code, Section 2518(8)(d) as to all persons intercepted during the subject electronic surveillance until further Order of the Court; and

(e) Directing that this Order and Application be sealed until further Order of the Court.

In support of this Application, the United States of America represents as follows:

1. On August 30, 2018, pursuant to an application by Assistant U.S. Attorney Eric Rosen, an Order was issued by the Honorable Allison D. Burroughs, District of Massachusetts, authorizing the interception of wire and electronic communications of the Target Subjects, described therein, over TARGET TELEPHONE 1 for a period of 30 days. The monitoring of TARGET TELEPHONE 1 began on August 30, 2018 and ceased at midnight of September 27, 2018.

2. The government's investigation of this matter continues in that SINGER is now cooperating with investigators and he is placing consensual calls to various target subjects. Notification to the persons whose conversations were intercepted would alert the subjects to the existence and extent of the investigation, and should therefore be postponed until ordered by the Court.

WHEREFORE, I respectfully request that the Court issue an Order granting this Application.

Respectfully submitted,

ANDREW E. LELLING
UNITED STATES ATTORNEY

By:



ERIC S. ROSEN
Assistant U.S. Attorney

Dated: October 2, 2018